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8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA

10 UNITED STATES OF AMERICA,
11 Plaintiff,
12 v.
13 MANUEL EDWIN MARTINEZ,
14 Defendant.
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Case No. 2:22-cr-00135-GMN-NJK

**Stipulation to Extend Deadline to File
Reply to Response to Motion for
Reconsideration
(First Request)**

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17 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,
18 United States Attorney, and Daniel J. Cowhig, Assistant United States Attorney, counsel for
19 the United States of America, and Rene L. Valladares, Federal Public Defender, and Benjamin
20 F. J. Nemec, Assistant Federal Public Defender, counsel for Manuel Edwin Martinez, request
21 that the due date for Mr. Martinez's Reply to Response to Motion for Reconsideration (ECF
22 No. 72), be extended from June 13, 2024 to June 20, 2024.

23 This Stipulation is entered into for the following reasons:

24 1. The government's response brings certain arguments that requires in-depth
25 historical research. Since Duarte is a new case and brings novel concepts along with it, Mr.
26 Martinez needs additional time so this Court is fully informed and competently briefed.

2. The parties agree to the extension.

1 DATED this 13th day of June, 2024.

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3 RENE L. VALLADARES
Federal Public Defender

JASON M. FRIERSON
United States Attorney

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5 By /s/ Benjamin F. J. Nemec
6 BENJAMIN F. J. NEMEC
Assistant Federal Public Defender

By /s/ Daniel J. Cowhig
DANIEL J. COWHIG
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 MANUEL EDWIN MARTINEZ,

7 Defendant.
8

Case No. 2:22-cr-00135-GMN-NJK

ORDER

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10 IT IS THEREFORE ORDERED that upon consideration of Defendant's Request to
11 Extend the Deadline for filing his Reply to Response to Motion for Reconsideration, that the
12 Defendant's deadline to file his Reply is extended to June 20, 2024.

13 DATED this 13 day of June, 2024.

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16 UNITED STATES DISTRICT JUDGE
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